

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO, WESTERN DIVISION

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Mildred W. Finch, et. al.

:

Case No. C-1-02-132

Plaintiffs

:

Vs

:

(Judge Beckwith)

George Fiorini, DBA the Fiorini Agency

:

And

:

Steven Ventre

:

And

:

AMENDMENT TO MOTION
FOR CERTIFICATION OF
REVISED CLASS

Guardian Invesments LLC.

:

And

:

Terrance Lee Quatkemeyer
Aka Terry Quinn

:

:

And

:

Sanitec Ltd.

Plaintiffs hereby amend their Motion for Certification of Revised Class, filed
herein on August 25, 2003, to change the description of the class to:

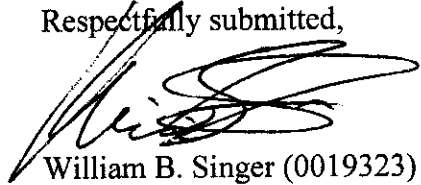
Residents of Ohio, Kentucky, and Indiana who at various times purchased
through the Defendant George Fiorini and others promissory notes issued
by Standard Trust and Guardian Investments LLC.

MEMORANDUM

This amendment to plaintiffs's Motion for Certification of a Revised Class simply
adds Standard Trust as an issuer of promissory notes purchased by members of the

Plaintiff Class. Standard Trust was an insubstantial Ohio business trust which issued promissory notes to a majority of the members of the Plaintiff Class, in return for moneys "invested" with George Fiorini. All or part of the money given in exchange for Standard Trust promissory notes was transferred by Fiorini to Guardian Investments LLC, all as alleged in the Second Amended Complaint herein. Guardian Investments LLC is therefore a successor to Standard Trust, and the Plaintiff Class should consist of those who invested in either or both of the said entities.

Respectfully submitted,



William B. Singer (0019323)
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing memorandum was served by ordinary mail upon Patrick J. Hanley, Esq., trial Attorney for Defendants Steven Ventre and Guardian Investments LLC, 214 E. 4th Street, Covington, Ky 41011, George Fiorini, 7641 Wesselman Road, Cleves, Ohio 45001, and John R. Climaco Esq., attorney of record for Sanitec Ltd., Climaco, Lefkowitz, Peca, Wilcox & Garofoli, Co. LPA The Halle Building 1228 Euclid Avenue Suite 900, Cleveland, Ohio 44102 on the 19th day of September, 2003

